From: Joel S. Ratner [mailto:jsrat@adelphia.net] **Sent:** Tuesday, October 14, 2003 10:42 AM **To:** Comments@msha.gov; Comments@msha.gov

Cc: jfrank@rentar.com

Subject: Rentar environmental solutions, inc

Joel S. Ratner

Rentar Environmental Solutions, Inc.

11586 Pierson Road, West Palm Beach, FL 33414 Telephone 561-333-3411 Fax 561-828-0467 Email: President@Rentar.com



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Rentar Environmental Solutions, Inc.

Manufacturer of the Rentar Fuel Catalyst

11586 Pierson Road L1 * West Palm Beach, Florida 33414 Telephone: (561) 333-3411 * Fax: (561) 828-0467

October 14, 2003

MSHA Office of Standards, Regulations, and Variances 1100 Wilson Blvd., Room 2313 Arlington, Virginia 22209-3939

Office of Information and Regulatory Affairs Office of Management and Budget New Executive Office Building 725 17th Street, North West Washington, DC 20503

RE: Proposed Rule 30 CFR Part 37

To Whom it May Concern,

We write with reference to Department of Labor, Mine Safety and Health Administration's proposed rule 30 CFR Part 57, pertaining to Diesel Particulate Matter Exposure of Underground Metal and Nonmetal Miners. Rentar Environmental Solutions, Inc. of 11586 Pierson Road, West Palm Beach, Florida 33414 requests that the following comments be included concerning the specific testing noted as follows:

- [1] In the section entitled "Specific Control Technology Studies" on page 48680 and testing referred to as "Rogers Group, Jefferson County Mine" on page 48681, it should be noted several months passed between baseline samples taken during the winter of 2003 and follow-up samples taken during the summer of 2003. During that intervening period, it is noteworthy that the mine had a change in ventilation. It should also be noted that the only samples deemed to be usable were the inlet and outlet ventilation samples. All other samples used to determine if there is a measurable difference in DPM were disqualified.
- [2] In the section entitled "Evaluation of Fuel Oxygenator System" on page 48683, it should be noted that MSHA and Rentar Environmental Solutions, Inc. both have agreed to continue testing based on several lab and other field tests that demonstrated reductions of CO, NO, NO2, SO2, Particulate Matter and Opacity.

Yours truly,

Joel S. Ratner, President

Cc: Peter Moroz Joel Frank